

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

The International Investment Group L.L.C.,

Opposer,

y.

IIG S.A.,

Applicant.

Opposition No. 91178514
Serial Nos. 78/840,194
78/840,184

Commissioner for Trademarks
Box TTAB - No Fee
P.O. Box 1451
Alexandria, VA 22313-1451

APPLICANT'S MOTION FOR EXTENSION OF TIME TO RESPOND TO AND OPPOSE
(1) OPPOSER'S MOTION TO COMPEL AND (2) OPPOSER'S MOTION TO TEST THE
SUFFICIENCY OF APPLICANT'S RESPONSE TO OPPOSER'S REQUEST FOR ADMISSION

Applicant requests a 30 day extension of time, namely from July 23, 2008 until August 23, 2008, to respond to and oppose opposer's motion to compel production of documents and responses to interrogatories, and opposer's motion to test the sufficiency of applicant's response to opposer's request for admission pursuant to 37 C.F.R. §2.116(a). Good cause exists for the requested extension as is evidenced by the following facts and circumstances.

1. The motions were mailed on July 3, 2008 to Attorney Barbara Loewenthal of this firm. Ms. Loewenthal advised me that she has been working with the applicant to prepare a response to the motions as appropriate and that many of the document requests and interrogatories are burdensome and seek information outside of the scope of this proceeding. Ms. Loewenthal has been and is the principal attorney in this matter and is the person at this firm who is most familiar with the applicant, the applications that have been opposed, and the pleadings and discovery in this proceeding thus far. She is also the person most familiar with the motions, which consists of a heavily factual and detailed analysis of the discovery in this proceeding.



07-28-2008

2. On Sunday, July 20, 2008, Ms. Loewenthal fell in her home and injured herself. She went to the hospital and learned that she fractured her pelvic bone. Surgery was performed yesterday upon confirmation of the fracture.

3. Ms. Loewenthal called me yesterday from the hospital and asked me to advise the applicant that she had not followed up this week with applicant in connection with the response due to the motions because of her injury. Upon learning this, applicant asked that I get an extension of time to allow Ms. Loewenthal the opportunity to counsel and work with applicant with respect to the opposition to the motions. I advised Ms. Loewenthal of same. She also asked me to obtain an extension so as to allow her time to complete her opposition to the motions.

4. In an effort to obtain opposer's consent to this request, I made several telephone calls to Attorney Elizabeth Billingsley yesterday and left her a message requesting that she consent to our request for an extension given the circumstances of Ms. Loewenthal's injury. I did not get a return call. This morning, I again called her office and left a voice mail with her again explaining the situation and requesting her consent to an extension. I also left a voice mail with Ms. Billingsley's assistant. I then called the office of Attorney Karl Zielaznicki. As of 4pm today, I have received no call from Ms. Billingsley's office, but I have this afternoon received a return call from Mr. Zielaznicki. Mr. Zielaznicki informed me that he needed verification by way of this motion as to the reasons for the need for the extension, and his client would make a decision upon its review as to whether to provide opposer's consent or not.

5. Although my office has other attorneys, the only two attorneys familiar with this proceeding is Ms. Loewenthal and myself. My role in this matter has been marginal. It would be unfair to applicant to deny applicant the opportunity of relying on Ms. Loewenthal's advice and knowledge of the discovery thus far in opposing the motions. Given the gravity of the present motions, and applicant's interest in opposing same, good cause exists for extending applicant's time to respond and oppose the motions. Furthermore, had Ms. Loewenthal not sustained her injury and been in the office these past three business days, she would have completed the

requisite opposition papers and would have responded timely. Obviously, her injury was not foreseeable.

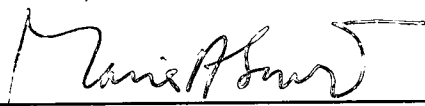
6. This proceeding is suspended pending a determination of opposer's motions. Accordingly, the extension request would not require a resetting of testimony and trial dates.

In view of the foregoing, applicant requests an extension of time to oppose the motions and submits that under the circumstances a 30 day extension is reasonable and appropriate.

Dated: New York, New York
July 23, 2008

Respectfully submitted,

GOTTLIEB, RACKMAN & REISMAN, P.C.



Maria A. Savio
Barbara Loewenthal
Attorneys for Applicant
270 Madison Avenue
New York, NY 10016
(212) 684-3900

CERTIFICATE OF MAILING

I hereby certify that this Motion is being deposited with the U.S. Postal Service, as first class mail, in a postage prepaid envelope addressed to: Commissioner for Trademarks, Box TTAB - No Fee, P.O. Box 1451, Alexandria, VA 22313-1451, on July 23, 2008.

Dated: New York, New York
July 23, 2008



Madelin Rowland

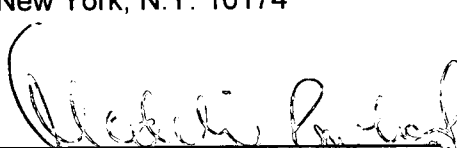
CERTIFICATE OF SERVICE

I hereby certify that a copy of this Motion was served on Elizabeth A. Billingsley, Esq. and Karl M. Zielaznicki, Esq., Attorneys for Opposer, on this 23rd day of July, 2008, via First Class Mail, addressed as follows:

Elizabeth A. Billingsley, Esq.
Troutman Sanders LLP
1660 International Drive, Suite 600
McLean, VA 22102

Karl M. Zielaznicki, Esq.
Troutman Sanders LLP
405 Lexington Avenue
New York, N.Y. 10174

Dated: July 23, 2008



Madelin Rowland